

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></div> <div>Debtors.¹</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div> <div>(Jointly Administered)</div> <div>Re: Dkt. Nos. 3159, 3280, 3283</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>No. 17 BK 4780-LTS</div>
<div>ANTONIO FUENTES-GONZALES, MARIA IVONNE VIGUIE-FERNANDEZ</div> <div>Movants,</div> <div>-against-</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Respondent.</div>	<div>Motion Relates Only to PREPA and Shall be Filed in Both the Lead Case No. 17 BK-3283-LTS and in PREPA's Title III Case No. 17 BK 4780-LTS</div>

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**SECOND CONSENTED-TO MOTION FOR EXTENSION
OF DEADLINES IN CONNECTION WITH
ANTONIO FUENTES-GONZALES, MARIA IVONNE VIGUIE-
FERNANDEZ'S MOTION FOR RELIEF FROM AUTOMATIC STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), on behalf of the Puerto Rico Electric Power Authority (“PREPA”) pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, by and through its undersigned counsel, respectfully submits this second consented-to motion for entry of an order, substantially in the form attached hereto as **Exhibit A**, further extending the deadlines in connection with the *Motion for Relief from Automatic Stay* [Case No. 17-03283, Dkt. No 3159] (the “Motion for Relief from Automatic Stay”) filed by Antonio Fuentes-Gonzales, Maria Ivonne Viguie-Fernandes, and the conjugal partnership constituted by them (together, the “Movants”).² In support of this motion, AAFAF respectfully states as follows:

BACKGROUND

On May 25, 2018, the Movants filed the Motion for Relief from Automatic Stay seeking relief from the automatic stay “for cause” under section 362(d) of title 11 of the United States Code. Specifically, the Movants seek a modification of the stay in order to execute their judgment for monetary relief against PREPA in *Autoridad de Energía Eléctrica v. Antonio Fuentes Gonzales et al.*, Case No. KEF 2012-0039 (the “Fuentes-Viguie Action”).

Pursuant to this Court’s order entered on May 25, 2018, opposition papers to the Motion for Relief from Automatic Stay were originally scheduled to be filed by June 8, 2018, and Movants’ reply papers by June 15, 2018 [Case No. 17-03283, Dkt. No 3162].

² The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), 48 U.S.C. §§ 2101-2241, has authorized AAFAF to file this motion on behalf of PREPA.

On June 8, 2018, AAFAF filed the *Consented-to Motion for Extension of Deadlines in Connection with Antonio Fuentes-Gonzales, Maria Ivonne Viguie-Fernandez's* [Case No. 17-03283, Dkt. No 3280] ("First Motion for Extension of Deadlines") seeking a fifteen-day extension of the applicable deadlines because the parties needed time to reach an agreement that may resolve the Fuentes-Viguie Action in its entirety. On June 11, 2018, this Court entered an order granting the First Motion for Extension of Deadlines [Case No. 17-03283, Dkt. No 3283]. Pursuant to this Court's June 11, 2018 order, opposition papers to the Motion for Relief from Automatic Stay must be filed by June 23, 2018, and Movants' reply papers must be filed by June 30, 2018.

The parties continue to be engaged in settlement discussions that may resolve the Fuentes-Viguie Action in its entirety, but the parties need additional time to reach an agreement. The Movants have consented to a ten (10) business-day extension of the applicable deadlines.

AAFAF submits that no party or creditor will be prejudiced by this second extension.

RELIEF REQUESTED

By this motion, AAFAF requests a ten (10) business-day extension of the applicable deadlines. AAFAF requests entry of an order extending the deadlines as follows:

- Any objection to the Motion for Relief from Automatic Stay shall be filed by **July 9, 2018**.
- Any reply shall be filed by **July 13, 2018**.

WHEREFORE, AAFAF respectfully requests the Court to enter an order, substantially in the form attached hereto as **Exhibit A**, (a) granting the motion and (b) granting such other relief as is just and proper.

Dated: June 22, 2018
San Juan, Puerto Rico

Respectfully submitted,

THE PUERTO RICO FISCAL AGENCY
AND FINANCIAL ADVISORY
AUTHORITY, as Fiscal Agent for PREPA

By its attorneys,

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THE PUERTO RICO ELECTRIC
POWER AUTHORITY

By its attorneys,

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Exhibit A
Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></div> <div>Debtors.¹</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div> <div>(Jointly Administered)</div> <div>Re: Dkt. Nos. 3159, 3280, 3283</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>No. 17 BK 4780-LTS</div>
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[Caption Continued on the Next Page]

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**ORDER GRANTING SECOND CONSENTED-TO MOTION FOR
EXTENSION OF DEADLINES IN CONNECTION WITH
ANTONIO FUENTES-GONZALES, MARIA IVONNE VIGUIE-
FERNANDEZ'S MOTION FOR RELIEF FROM AUTOMATIC STAY**

Upon the Second Consented-To Motion for Extension of Deadlines in Connection with Antonio Fuentes-Gonzales, Maria Ivonne Viguie-Fernandez's Motion for Relief from Automatic Stay (the "Motion")⁴ and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted.
2. Any objection to the Motion for Relief from Automatic Stay shall be due on **July 9, 2018**.
3. Any reply shall be due on **July 13, 2018**.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
5. This Order resolves docket entry no._____.

SO ORDERED.

Dated: _____, 2018
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

⁴ Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.